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**WASTE PIT AREA STORMWATER REMOVAL
ACTION-WORK PLAN MODIFICATIONS**

DOCUMENT DATE 11-15-91



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

November 15, 1991

Re: WASTE PIT AREA STORMWATER
REMOVAL ACTION-W.P.
MODIFICATIONS

Mr. Jack R. Craig
Project Manager
U.S. DOE FEMP
P.O. Box 398705
Cincinnati, Ohio 45239

Dear Mr. Craig:

Listed below are several Ohio EPA comments on the Work Plan Modifications for the Waste Pit Area Stormwater Runoff Removal Action.

General Comment

1. It should be noted at the July Groundwater meeting in Cincinnati, Ohio between Ohio EPA, USEPA and DOE, DOE agreed to containerize all soils excavated in areas where soil samples detected above background levels of HSL constituents. DOE agreed to maintain this until such time as a written change of procedure was submitted and approved by the EPAs.

Specific Comments on the Revised SAP

1. Page three, First bullet: Since the risk based remediation goals are likely to be below 100 pCi/g for total uranium and 50 pCi/g for total thorium and the OU1 Treatability Study Work Plan includes a statement of a remedial action objective of 5 and 15 pCi/g for thorium, soil stockpiles contaminated with uranium below 100 and thorium below 50 pCi/g should not be released for unrestricted use within the FEMP. It makes no sense for DOE to further spread soil which they know will have to be remediated at a later date. The stockpiles should be maintained in a manner to prevent erosion and incorporated into the Improved Storage of Soil and Debris Removal Action #17.
2. Page three, bullets: DOE has failed to state how it will address soils which are contaminated with above background levels of HSL constituents but pass TCLP. These soils may be considered a solid waste under Ohio Solid Waste regulations.

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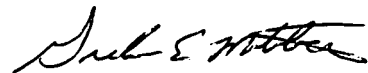
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Specific Comments on the Revised WP

1. Page ten, Second paragraph: DOE should provide further detail within the work plan on how a $10E-7$ cm/sec permeability will be achieved.

If you have any questions about these comments please contact me.

Sincerely,



Graham E. Mitchell
Project Manager

GEM/acn

cc: Kathy Davidson, Ohio EPA
Jim Saric, U.S. EPA
Lisa August, GeoTrans
Ed Schuessler, PRC
Robert Owen, ODH